

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

MICHAEL L. BLUMENTHAL,)	
)	
Plaintiff,)	Court No. 07 C 7230
vs.)	
)	
MATTHEW H. ANSELMO,)	Judge Joan B. Gottschall
M & M MARKETING, L.L.C., and KATHRYN)	
HEMENWAY)	
)	Magistrate Michael T. Mason
Defendants.)	

**PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO
RESPOND TO DEFENDANT HEMENWAY'S MOTION TO DISMISS**

Now comes the plaintiff, MICHAEL L. BLUMENTHAL, and moves this Honorable Court for an extension of time to respond to Defendant, KATHRYN HEMENWAY's Motion to Dismiss.

In support of this motion, Plaintiff respectfully states as follows:

1. On January 28, 2008, Defendant Hemenway filed her Motion to Dismiss pursuant to Federal Rule of Civil Procedure 12(b)(2) and 12(b)(3). Defendant's motion is noticed for February 7, 2008 at 9:30 a.m.

2. Plaintiff, Michael L. Blumenthal, is scheduled to begin trial on February 11, 2008 in the case of Abrams Family Foundation v. Congregation B'nai Shalom, Court No. 04 L 10457 before the Honorable Judge Ronald Bartkowicz. Said trial is anticipated to last approximately two and half (2-1/2) weeks.

3. Plaintiff, Michael L. Blumenthal, is the attorney primarily responsible for the handling of all pretrial matters in this case. Martin A. Blumenthal, the trial lawyer listed, will only be involved in the event this matter proceeds to an actual trial. Because of Plaintiff, Michael L. Blumenthal's trial schedule, he will be unable to respond to Defendant Hemenway's Motion to Dismiss before March 14, 2008.

WHEREFORE, the Plaintiff, MICHAEL L. BLUMENTHAL, respectfully requests a briefing schedule in this matter which allows Plaintiff through and including March 14, 2008 to respond to Defendant Hemenway's Motion to Dismiss.

Respectfully submitted,

MICHAEL L. BLUMENTHAL, Plaintiff

By: /s/ Michael L. Blumenthal
One of His Attorneys

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